



ecology and environment, inc.

International Specialists in the Environment

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January 2, 1997

Mr. Stephen Nathan (SM-5J)
ARCS V Project Officer
U.S. Environmental Protection Agency
Contracts Management Section
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Conflict of Interest Search for the Sauget Area 1 and 2 Sites, Sauget, Illinois.

Dear Mr. Nathan:

Ecology and Environment, Inc., (E & E) has conducted a conflict of interest (COI) review for potentially responsible parties (PRPs) associated with the above-referenced site. The COI review was conducted in accordance with the E & E COI policy and contract requirements for the following sites/facilities:

SITE: Sauget Area 1 and Area 2 sites, Sauget, Illinois

PRPs: Per attached listing provided by EPA

E & E is currently performing work for the Rogers Cartage Company (Rogers), which is listed as a PRP for the Area 1 sites. We also have provided consulting services in the past for Rogers. E & E's current work for Rogers involves site assessment and corrective action planning associated with a RCRA closure at Rogers' Hammond, Indiana facility. This work was initiated in February, 1992, and is ongoing, with the total revenue to date being \$260,320. Past work for Rogers included providing Emergency Response Services for Rogers' facilities in Springfield, Illinois (April 1991); Arnold, Missouri (May 1994); and Stevensville, Illinois (October 1994), with a net revenue of \$900 for these assignments. In addition, E & E provided consultation on compliance issues at the Rogers' Hammond facility on an intermittent basis between February 1991 and March 1992. The net revenue from this work was \$1,862.15.

The total amount of E & E revenues to date from work performed for Rogers is [REDACTED]. E & E's gross revenues for the last three fiscal years are: [REDACTED]. E & E has not performed any work associated with Rogers' Sauget facility, nor is any planned at the present time.

The above information is related in the interest of providing full disclosure. E & E does not believe that our work for Rogers constitutes a conflict of interest because there has been no involvement at the Sauget site, and the revenue derived from this work is a very minor component of E & E's overall revenue base.

In addition to the work described above, E & E notes that we conducted work at the Sauget Area 1 and Area 2 sites under contract to the Illinois Environmental Protection Agency.

E & E performed an expanded site investigation at the Dead Creek/Sauger sites from 1985 through 1987, and performed oversight of PRP RI/FS activities at the Monsanto/River's Edge Landfill from 1991 through 1995. Because this work was performed on behalf of another regulatory agency, E & E does not believe it constitutes a conflict of interest.

Aside from the matters disclosed above, no facts or circumstances were identified which would present an actual or potential COI situation for the other sites/facilities listed on the attached.

All E & E personnel working on ARCS contract work assignments have been informed of their obligation to report any potential personal conflicts of interest. No personal conflicts of interest were identified for these sites/facilities. In addition, E & E recognizes its continuing obligation to identify and report any actual or potential conflicts of interest that may arise during the performance of this work assignment. If you have any questions concerning this information, please do not hesitate to contact me.

Sincerely,

ECOLOGY AND ENVIRONMENT, INC.



ARCS Program Manager

cc: P. Hendrixson, EPA CO